

JP:LMN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

05-0406M

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

JESSICA SANCHEZ,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER HERZOG, being duly sworn, deposes and states that he is a Special Agent with the United States Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, on or about March 26, 2005, within the Eastern District of New York and elsewhere, defendant JESSICA SANCHEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

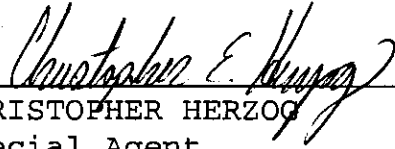
1. On or about March 26, 2005, defendant JESSICA SANCHEZ arrived at John F. Kennedy International Airport in Queens, New York, aboard American Airlines flight No. 976 from Caracas, Venezuela.

2. JESSICA SANCHEZ was selected by Customs and Border Protection ("CBP") officers for a routine inspection. She presented one blue "Samsonite" suitcase for inspection, and claimed ownership of the suitcase and all its contents. She was also in possession of a baggage claim ticket that matched that on the suitcase and a key for the suitcase. During a routine inspection of the suitcase, CBP officers noticed that the suitcase seemed unusually thick and heavy.

3. One side of the suitcase was probed, and a powdery substance was revealed, which field-tested positive for the presence of heroin. At that point, JESSICA SANCHEZ was then placed under arrest.

4. The total approximate gross weight of the substance that field-tested positive for the presence of heroin was 15,137.0 grams.

WHEREFORE, your deponent respectfully requests that the defendant JESSICA SANCHEZ be dealt with according to law.


CHRISTOPHER HERZOG
Special Agent
U.S. Immigration and
Customs Enforcement

Sworn to before me this
28th day of March, 2005

signed RLM

(UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK